

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
Case No: 3:20-cv-211

JUDICIAL WATCH, INC.,

Plaintiff,

v.

NORTH CAROLINA: THE NORTH CAROLINA
STATE BOARD OF ELECTIONS; KAREN
BRINSON BELL, in her capacity as the Executive
Director of the North Carolina State Board of
Elections; THE MECKLENBURG COUNTY
BOARD OF ELECTIONS; MICHAEL G.
DICKERSON, in his official capacity as the
Director of Elections for Mecklenburg County;
CAROL HILL WILLIAMS, in her capacity as the
Chair of the Mecklenburg County Board of
Elections; THE GUILFORD COUNTY BOARD
OF ELECTIONS; CHARLIE COLLICUTT, in his
official capacity as Director of Elections for
Guilford County; and HORACE KIMEL, JR., in
his capacity as Chair of the Guilford County Board
of Elections,

Defendants, and

THE LEAGUE OF WOMEN VOTERS OF
NORTH CAROLINA AND THE NORTH
CAROLINA A. PHILIP RANDOLPH
INSTITUTE,

Proposed Defendant-Intervenors.

**MOTION FOR AN EXTENSION OF TIME
TO ANSWER OR OTHERWISE RESPOND
TO PLAINTIFF'S COMPLAINT**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Civil Rule 7.1, Defendants The Mecklenburg County Board of Elections, Michael G. Dickerson, and Carol Hill Williams (collectively, the "Mecklenburg County Defendants") move the Court for a 30-day extension of time to answer or otherwise respond to Plaintiff's Complaint. Plaintiff consents to this motion and the requested relief. In support of this Motion, the Mecklenburg County Defendants show the Court the following:

1. The Mecklenburg County Defendants received a copy of the Complaint on April 14, 2020. Assuming, *arguendo*, that service was perfected on that date, the Mecklenburg County Defendants current deadline to respond to the Complaint is May 5, 2020 pursuant to Rule 12(a)(1)(A)(ii) of the Federal Rules of Civil Procedure.

2. The Mecklenburg County Defendants need additional time to evaluate the case and the allegations in Plaintiff's Complaint, the need for which is amplified due to the current pandemic and the recently filed motion to intervene (Doc. No. 19). On April 21, 2020, the Court granted an identical extension requested by other defendants. (Doc. No. 18.) This is the Mecklenburg County Defendants' first motion for an extension of time to answer or otherwise respond to the Complaint.

3. Plaintiff will not be prejudiced by this Motion and, indeed, consents to this motion and the requested extension.

4. As a result, there is good cause to grant the requested extension.

5. A proposed order is attached as Exhibit 1.

WHEREFORE, the Mecklenburg County Defendants respectfully request that the Court grant a 30-day extension to answer or otherwise respond to Plaintiff's Complaint until June 4, 2020.

This 22nd day of April, 2020.

WOMBLE BOND DICKINSON (US) LLP

/s/ G. Michael Barnhill

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